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Attorney for Plaintiff
HB Productions, Inc.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

HB Productions, Inc.,)	Case No.: 1:19-cv-487-JMS-KJM
)	(Copyright)
Plaintiff,)	
vs.)	PLAINTIFF'S SECOND RULE
)	55(b)(1) MOTION FOR CLERK TO
Muhammad Faizan,)	ENTER DEFAULT JUDGEMENT
)	AGAINST DEFENDANT
Defendant.)	MUHAMMAD FAIZAN;
)	DECLARATION OF COUNSEL;
)	BILL OF COSTS; PROPOSED
)	ORDER
)	
)	
)	

PLAINTIFF'S SECOND RULE 55(b)(1) MOTION FOR CLERK TO
ENTER DEFAULT JUDGMENT AGAINST DEFENDANT MUHAMMAD
FAIZAN

TO: CLERK OF THE COURT:

Pursuant to Fed R. Civ. P. 55(b)(1), Plaintiff HB Productions, Inc.
("Plaintiff") hereby moves for the Clerk of the Court to enter default judgment

against Defendant Muhammad Faizan for the certain sum of \$270,224.908 and costs of \$4,410.98.

Defendant Muhammad Faizan was served a copy of the First Amended Complaint (“FAC”) via airmail on Feb. 14, 2020 per Fed R. Civ. P. 5(b)(2)(C). *See* Certificate of Service [Doc. #41]. Defendant Muhammad Faizan was served a copy of the original Complaint on October 4, 2019. *See* Proof of Service [Doc. #14]; *see also* Supplemental Declaration of Muhammad Waqar [Doc. #21-2]. Service of the original Complaint was performed in accordance with the Hague Service Convention and the internal law or rule in Pakistan. *See* Affidavit of Muhammad Abeed Atiff [Doc. #14-1].

Defendant Muhammad Faizan’s responsive pleading to the FAC was due on or before February 28, 2020 per Fed R. Civ. P. 15(a)(3). Entry of Default was entered against Defendant for having failed to appear or otherwise defend on March 3, 2020 [Doc. #43].

Plaintiff has attached an Affidavit of Counsel showing the amount due of \$270,224.90 and that Defendant is not a minor nor an incompetent person. The certain amount due is less than the amount that was pleaded in the FAC. *See* FAC at ¶141, pg. 33.

For these reasons, Plaintiff request that the Clerk of the Court enter default judgment against Defendant Muhammad Faizan for the certain sum of \$270,224.90. and costs of \$4,410.98.

DATED: Kailua-Kona, Hawaii, March 27, 2020.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiff